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*Of Attorneys for Defendant*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

TYLER MILLER, an individual

Plaintiff,

v.

HENRY HEIMULLER, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; BRUCE HOLSEY, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; JEFF FLATT, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; and SHELLEY HENNESSY, in her official capacity as Board Member of the Columbia 9-1-1 Communications District,

Defendants.

Case No 3:23-cv-00293-SI

**DECLARATION OF RONALD W.  
DOWNS IN SUPPORT OF  
CHANDRA EGAN'S RESPONSE  
TO PLAINTIFF'S MOTION TO  
COMPEL**

I, Ronald W. Downs, declare as follows:

1. I represent non-party defendant Chandra Egan in the above-entitled matter.
2. Attached as **Exhibit 1** to this declaration is a copy of the Order of Judge

Beckerman in the matter of Tyler Miller v. Steve Watson, US District Court, Case No. 3:18-cv-00562-SB.

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**Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing  
is true and correct.**

DATED this 28<sup>th</sup> day of September 2023.

*s/ Ronald W. Downs*

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Ronald W. Downs, OSB# 920530  
Attorney for Chandra Egan

**CERTIFICATE OF SERVICE**

I hereby certify that I service the foregoing **DECLARATION OF RONALD W. DOWNS IN SUPPORT OF CHANDRA EGAN'S RESPONSE TO PLAINTIFF'S MOTION TO COMPEL** on the following party or parties, by the method(s) indicated:

Clifford S. Davidson <a href="mailto:csdavidson@swlaw.com">csdavidson@swlaw.com</a>	<input type="checkbox"/>	FIRST CLASS MAIL
Drew L. Eymann <a href="mailto:deyman@swlaw.com">deyman@swlaw.com</a>	<input checked="" type="checkbox"/>	E-MAIL
Snell & Wilmer LLP 1455 SW Broadway Ste 1750 Portland OR 97201 <i>Of Attorneys for Plaintiff</i>	<input checked="" type="checkbox"/>	E-FILING NOTIFICATION

DATED this 28<sup>th</sup> day of September 2023.

s/Ronald W. Downs  
Ronald W. Downs, OSB# 920530  
503-375-8898; [rdowns@sdao.com](mailto:rdowns@sdao.com)  
Of Attorneys for Chandra Egan